

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



JUUL LABS, INC.,

Plaintiff,

vs.

THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,

Defendants.

Civil Action No. 1:19-cv-00715

PRO-SE ANSWER OF SARAH GRIFFITH (SAGRIF-66)

Sarah Griffith, as a pro-se defendant, answers the Verified Complaint as follows:

1. Griffith denies the allegations stated in numerical paragraph 1 of the Juul Verified Complaint.
2. Griffith denies the allegations stated in numerical paragraph 2 of the Juul Verified Complaint.
3. Griffith denies the allegations stated in numerical paragraph 3 of the Juul Verified Complaint.
4. Griffith denies the allegations stated in numerical paragraph 4 of the Juul Verified Complaint.
5. Griffith denies the allegations stated in numerical paragraph 5 of the Juul Verified Complaint.
6. Griffith denies the allegations stated in numerical paragraph 6 of the Juul Verified Complaint.
7. Griffith denies the allegations stated in numerical paragraph 7 of the Juul Verified Complaint. This allegation is actually laughable considering the facts produced during the recent

congressional hearings which demonstrated the manner in which Juul has marketed its products to children.

8. Griffith denies the allegations stated in numerical paragraph 8 of the Juul Verified Complaint.

9. Griffith denies the allegations stated in numerical paragraph 9 of the Juul Verified Complaint.

10. Griffith denies the allegations stated in numerical paragraph 10 of the Juul Verified Complaint.

11. Griffith denies the allegations stated in numerical paragraph 11 of the Juul Verified Complaint.

12. Griffith denies the allegations stated in numerical paragraph 12 of the Juul Verified Complaint.

13. Griffith denies the allegations stated in numerical paragraph 13 of the Juul Verified Complaint.

14. Griffith denies the allegations stated in numerical paragraph 14 of the Juul Verified Complaint.

15. Griffith denies the allegations stated in numerical paragraph 15 of the Juul Verified Complaint.

16. Griffith admits the allegations stated in numerical paragraph 16 of the Juul Verified Complaint.

17. Griffith denies the allegations stated in numerical paragraph 17 of the Juul Verified Complaint.

18. Griffith denies the allegations stated in numerical paragraph 18 of the Juul Verified Complaint.

19. Griffith denies the allegations stated in numerical paragraph 19 of the Juul Verified Complaint.

20. Griffith denies the allegations stated in numerical paragraph 20 of the Juul Verified Complaint. Griffith affirmatively asserts that she has never conducted any business in the Commonwealth of Virginia, targeted and directed products to the Commonwealth of Virginia, or sold or offered for sale any Counterfeit JLI Pods.

21. Griffith denies the allegations stated in numerical paragraph 21 of the Juul Verified Complaint. Griffith affirmatively asserts that she has never manufactured, imported, distributed, offered for sale, or sold any products using counterfeit versions of JLI's trademarks.

22. Griffith denies the allegations stated in numerical paragraph 22 of the Juul Verified Complaint.

23. Griffith denies the allegations stated in numerical paragraph 23 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint.

24. Griffith denies the allegations stated in numerical paragraph 24 of the Juul Verified Complaint.

25. Griffith denies the allegations stated in numerical paragraph 25 of the Juul Verified Complaint.

26. Griffith denies the allegations stated in numerical paragraph 26 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint.

27. Griffith denies the allegations stated in numerical paragraph 27 of the Juul Verified Complaint.

28. Griffith denies the allegations stated in numerical paragraph 28 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint.

29. Griffith denies the allegations stated in numerical paragraph 29 of the Juul Verified Complaint.

30. Griffith denies the allegations stated in numerical paragraph 30 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint.

31. Griffith denies the allegations stated in numerical paragraph 31 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint.

32. Griffith denies the allegations stated in numerical paragraph 32 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint.

33. Griffith denies the allegations stated in numerical paragraph 32 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint.

34. Griffith denies the allegations stated in numerical paragraph 34 of the Juul Verified Complaint. Griffith affirmatively asserts that she does not control the EBay account identified as sagrif-66 in Juul's Verified Complaint and did not place the EBay advertisement shown on pages 142 and 143 of Exhibit 2 to the Juul Verified Complaint. Griffith further asserts that she has never advertised, offered for sale or sold any products in the Commonwealth of Virginia.

35. Griffith denies the allegations stated in numerical paragraph 35 of the Juul Verified Complaint.

36. Griffith denies the allegations stated in numerical paragraph 36 of the Juul Verified Complaint.

37. Griffith denies the allegations stated in numerical paragraph 37 of the Juul Verified Complaint.

38. Griffith denies the allegations stated in numerical paragraph 38 of the Juul Verified Complaint.

39. Griffith denies the allegations stated in numerical paragraph 39 of the Juul Verified Complaint.

40. Griffith denies the allegations stated in numerical paragraph 40 of the Juul Verified Complaint.

41. Griffith denies the allegations stated in numerical paragraph 41 of the Juul Verified Complaint.

42. Griffith denies the allegations stated in numerical paragraph 42 of the Juul Verified Complaint.

43. Griffith denies the allegations stated in numerical paragraph 43 of the Juul Verified Complaint.

44. Griffith denies the allegations stated in numerical paragraph 44 of the Juul Verified Complaint.

45. Griffith denies the allegations stated in numerical paragraph 45 of the Juul Verified Complaint.

46. Griffith denies the allegations stated in numerical paragraph 46 of the Juul Verified Complaint.

47. Griffith denies the allegations stated in numerical paragraph 47 of the Juul Verified Complaint.

48. Griffith denies the allegations stated in numerical paragraph 48 of the Juul Verified Complaint.

49. Griffith denies the allegations stated in numerical paragraph 49 of the Juul Verified Complaint.

50. Griffith denies the allegations stated in numerical paragraph 50 of the Juul Verified Complaint.

51. Griffith denies the allegations stated in numerical paragraph 51 of the Juul Verified Complaint.

52. Griffith denies the allegations stated in numerical paragraph 52 of the Juul Verified Complaint.

53. Griffith denies the allegations stated in numerical paragraph 53 of the Juul Verified Complaint.

54. Griffith denies the allegations stated in numerical paragraph 54 of the Juul Verified Complaint.

55. Griffith denies the allegations stated in numerical paragraph 55 of the Juul Verified Complaint.

56. Griffith denies the allegations stated in numerical paragraph 50 of the Juul Verified Complaint.

57. Griffith denies the allegations stated in numerical paragraph 57 of the Juul Verified Complaint.

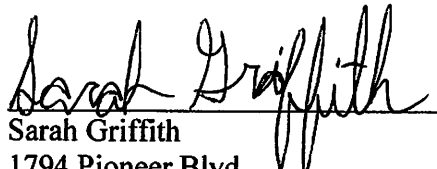
58. Griffith denies the allegations stated in numerical paragraph 58 of the Juul Verified Complaint.

59. Griffith denies any further allegation of Juul's Verified Complaint which is not specifically addressed above.

60. Griffith asserts all affirmative defenses available under federal law.

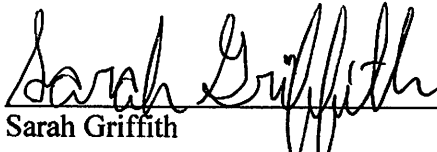
WHEREFORE, Sarah Griffith asks for the following:

1. Juul's Verified Complaint be dismissed as to her;
2. A trial by jury;
3. Any costs incurred, including attorneys' fees.
4. All other relief to which she may be entitled.


Sarah Griffith
1794 Pioneer Blvd
Burlington, Ky 41005
(859) 628-4639

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was mailed this 25 day of August 2019 to Monica Riva Talley, STERNE KESSLER GOLDSTEIN & FOX, PLLC, 1100 New York Ave., N.W., Suite 600, Washington, DC 20005-3934.


Sarah Griffith